

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

BLACK & DECKER, INC. and BLACK &
DECKER (U.S.), INC.,

Plaintiffs,

v.

ROYAL APPLIANCE MFG. CO., d/b/a TTI
FLOOR CARE NORTH AMERICA, and
TECHTRONIC INDUSTRIES CO., LTD.

Defendants.

Civil Action No. 1:08-cv-00590
Judge Manning
Magistrate Judge Keys

**ROYAL APPLIANCE MFG. CO.’S AND TECHTRONIC INDUSTRIES CO. LTD.’S
MOTION TO EXTEND THE TIME TO RESPOND TO PLAINTIFFS’ DISCOVERY
REQUESTS PENDING THE OUTCOME OF DEFENDANTS’ MOTION TO STAY**

Royal Appliance Mfg. Co. (“Royal”) and Techtronic Industries Co. Ltd. (“TTI”) (collectively “Defendants”), by and through their undersigned attorneys, hereby move for an extension of time to respond to Black & Decker, Inc.’s and Black & Decker (U.S.) Inc.’s (collectively “Plaintiffs”) discovery requests until 30 days after this Court rules on the pending Motion to Stay (filed on April 7, 2008). Alternatively, Defendants request a protective order requiring the withdrawal of Plaintiffs’ discovery requests and prohibiting service of the requests until after the Court has ruled on the pending Motion to Stay and issued a scheduling order.

Granting this motion will conserve judicial resources as well as the parties’ resources. Additionally, there will be no prejudice to Plaintiffs especially in view of the fact that Plaintiffs waited nearly three years after the last correspondence concerning the subject matter of this lawsuit before filing this action.

A memorandum in support of this Motion is being filed concurrently herewith.

Defendants sought concurrence on this Motion by voicemail, written correspondence and email beginning on April 10, 2008. On April 15, 2008, Plaintiffs advised that they opposed the Motion.

Dated: April 17, 2008

Respectfully submitted,

/s/ Manish K. Mehta

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Attorneys for Defendants,
ROYAL APPLIANCE MFG. CO. and
TECHTRONIC INDUSTRIES CO., LTD

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true and correct copy of the foregoing ROYAL APPLICANT MFG. CO.'S AND TECHTRONIC INDUSTRIES CO. LTD.'S MOTION TO EXTEND THE TIME TO RESPOND TO PLAINTIFFS' DISCOVERY REQUESTS PENDING THE OUTCOME OF DEFENDANTS' MOTION TO STAY is being served on the 17th day of April 2008, to the following attorney of record in the manner indicated.

Via filing with the Clerk of Court using the Case Management/electronic Case Filing ("CM/ECF") system:

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Attorney for Plaintiffs, Black & Decker Inc.
and Black & Decker (U.S.) Inc.

/s/ Manish K. Mehta
BRINKS HOFER GILSON & LIONE